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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (MG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
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**CERTIFICATE OF NO OBJECTION TO
MOTION OF UNITED STATES OF AMERICA FOR AN ORDER APPROVING RE-
APPOINTMENT OF EPLET LLC TO A SECOND TERM AS ADMINISTRATIVE
TRUSTEE OF THE ENVIRONMENTAL RESPONSE TRUST**

Pursuant to 28 U.S.C. § 1746 and Local Bankruptcy Rule 9075-2, the undersigned hereby certifies as follows:

1. On February 1, 2016, the United States of America, pursuant to section 105 of the Bankruptcy Code, filed a motion (the “**Motion**,” ECF No. 13595) seeking the entry of an order re-appointing to a second five-year term EPLET, LLC, by and through Elliott P. Laws, Esq., as Administrative Trustee of the Revitalizing Auto Communities Environmental Response Trust (“**RACER**”), which is charged pursuant to an Environmental Response Trust Consent Decree and Settlement Agreement (the “**ERT Settlement Agreement**”) approved by the Court

on July 5, 2009, with carrying out needed environmental actions at certain properties formerly owned by Debtor Motors Liquidation Company (f/k/a General Motors Corporation, hereafter, “MLC”), and its affiliated debtors, (collectively, the “Debtors”).

2. On February 1, 2016, the United States of America, through its counsel, served notice of the Motion by email to counsel for all parties that signed the ERT Settlement Agreement, and by ECF notice to all parties who have appeared in or registered to receive ECF notifications in the above-referenced matter. After a delay caused by administrative oversight, the United States also served the Motion on the Office of the United States Trustee by fax on February 5, 2016.

3. The deadline for submitting objections to the Motion was February 10, 2016, at 5:00 PM (Eastern Time) (the “Objection Deadline”). The Motion is scheduled to be heard on February 17, 2016, at 2:00 PM, before the Honorable Martin Glenn, United States Bankruptcy Judge, at One Bowling Green, New York. The Notice of Motion stated in part:

PLEASE TAKE FURTHER NOTICE that if no responses or objections are timely filed and served with respect to the Motion, the United States of America may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

4. The undersigned counsel represents that (i) more than 48 hours have passed since the expiration of the Objection Deadline, (ii) counsel has reviewed the Court’s docket not less than 48 hours after the expiration of the Objection Deadline, (iii) no objections, responsive pleadings, or requests for a hearing have been filed or served on this Office with respect to the Motion.

5. An electronic copy of the proposed order that was annexed to the Motion will be re-submitted to the Court, along with this Certificate of No Objection.

Based on the foregoing, the United States of America respectfully requests that the proposed order be entered, and the hearing on the Motion scheduled for February 17, 2016, be cancelled.

Dated: New York, New York
February 12, 2016

PREET BHARARA
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Southern District of New York

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TO: All parties via ECF notification

And by email to:

Joseph Smolinsky, Esq.
Thomas Moers Mayer, Esq.
Matt Williams, Esq.
Carl Garvey, Esq.
Counsel for all remaining signatories to the ERT Settlement Agreement

And by fax to the Office of the U.S. Trustee